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U.S. DISTRICT COURT

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*Attorneys for DP Creations, LLC*

Case: 2:22-cv-00230  
Assigned To : Barlow, David  
Assign. Date : 03/30/2022  
Description: DP Creations v. Adolly.com et al

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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DP CREATIONS, LLC dba BOUNTIFUL  
BABY, a Utah limited liability company

Plaintiff,

vs.

ADOLLY.COM, an unknown Chinese  
business entity; SHENZHEN CITY  
AIDUOLA HUALIANWANG, LTD. dba  
ADOLLY US, an unknown Chinese business  
entity; HUIZHOU CITY OTARD GIFTS,  
LTD., dba OTARDDOLLS, an unknown  
Chinese business entity; RUGAO LUOEN  
TRADING CO., LTD. dba REBORN DOLL  
GALLERY, an unknown Chinese business  
entity; NANJING TIANZENG GIFTS, LTD.,  
dba NPK, an unknown Chinese business  
entity.

Defendants.

**Case No:**

**[FILED UNDER SEAL]**

**VERIFIED COMPLAINT FOR  
COPYRIGHT INFRINGEMENT**

**JURY DEMANDED**

Plaintiff DP Creations, LLC dba Bountiful Baby (“Bountiful Baby”) complains and alleges as follows against Defendants Adolly.com (“ADC”), Shenzhen City Aiduola Hualianwang, Ltd., dba Adolly US (“ADUS”), Huizhou City Otard Gifts, Ltd., dba OtardDolls (“OTD”), Rugao Luoen Trading Company, Ltd., dba Reborn Doll Gallery (“RDG”), and Nanjing Tianzeng Gifts, Ltd., dba NPK (“NPK”) (collectively, “Defendants”).

### **THE NATURE OF THE ACTION**

1. This is an action for copyright infringement in violation of 17 U.S.C. § 106 *et seq.*
2. Bountiful Baby owns exclusive rights in United States Copyright Registration Nos. VA0002269514, VA0002269515, VA0002268599, VA0002269513, VA0002268423, VA0002264579, VA0002265489, VA0002255282, VA0002281257, VA0002281255, VA0002271682, VA0002272482, VA0002272481, VA0002284512, VA0002284359, VA0002272484, VA0002268524, VA0002268519, VA0002255449, VA0002271944, VA0002271942, VA0002273961, VA0002277644, and VA0002271799 (the “Bountiful Baby Copyrights”).
3. Denise and Nevin Pratt started Bountiful Baby after Denise discovered an extraordinary talent for making incredibly realistic dolls. These ultra-realistic dolls are known in the industry as “reborn dolls” because of their incredibly lifelike features and appearance.
4. Bountiful Baby specializes in selling kits and supplies for the making of reborn dolls, and its products are renowned for their exceptional realism. Such dolls are uncanny in their realism and can be almost indistinguishable from a real baby. The exemplary reborn doll below was painted and “brought to life” by master reborn artist Jacqueline Kramer.



<https://bountifulbaby.com/collections/full-vinyl-kits/products/6076>

5. Defendants are Chinese counterfeiters that steal Bountiful Baby's copyrighted reborn doll sculptures (covered by the Bountiful Baby Copyrights) and make unauthorized copies and infringe Bountiful Baby's rights by selling counterfeit products.

6. Bountiful Baby seeks, among other relief, an injunction preventing Defendants from further infringing the Bountiful Baby Copyrights, and damages or disgorgement of Defendants' profits from its infringement.

### **THE PARTIES**

7. Plaintiff Bountiful Baby is a dba of DP Creations, LLC, a Utah limited liability company with a principal place of business at 2140 South 3600 West, West Valley City, Utah 84119. Bountiful Baby does business in the District of Utah, has numerous employees and customers in the District of Utah, and has suffered injury in the District of Utah.

8. Defendant Adolly.com ("ADC") is a Chinese business entity. Defendant ADC copies sculptures owned by Bountiful Baby and lists them for sale on its website [www.adolly.com](http://www.adolly.com).

Defendant ADC accepts PayPal payments through [adolly@adolly.com](mailto:adolly@adolly.com) and [www.adolly.com](http://www.adolly.com) and corresponds with customers through an email address at [doll@adolly.com](mailto:doll@adolly.com) and [adolly@adolly.com](mailto:adolly@adolly.com).

9. Defendant Adolly US (“ADUS”) is a Chinese business entity. Defendant ADUS copies sculptures owned by Bountiful Baby and lists them for sale on [www.amazon.com](http://www.amazon.com) and [www.ebay.com](http://www.ebay.com). Defendant ADUS accepts payments and corresponds with customers through [www.amazon.com](http://www.amazon.com). Defendant ADUS does business on www.ebay.com as rebornfamily and adolly, accepts PayPal payments through [www.ebay.com](http://www.ebay.com), and corresponds with customers through [www.ebay.com](http://www.ebay.com) and an email address at [adolly\\_hws5398ng@members.ebay.com.hk](mailto:adolly_hws5398ng@members.ebay.com.hk).

10. Defendant OtardDolls (“OTD”) is a Chinese business entity. Defendant OTD copies sculptures owned by Bountiful Baby and lists them for sale [www.aliexpress.com](http://www.aliexpress.com). Defendant OTD accepts payments through [www.aliexpress.com](http://www.aliexpress.com) and corresponds with customers through [www.aliexpress.com](http://www.aliexpress.com) and an email address at [sales@otardgifts.com](mailto:sales@otardgifts.com).

11. Defendant Reborn Doll Gallery (“RDG”) is a Chinese business entity. Defendant RDG copies sculptures owned by Bountiful Baby and lists them for sale on [www.amazon.com](http://www.amazon.com). Defendant RDG corresponds with customers through [www.amazon.com](http://www.amazon.com) and an email address at [634843639@qq.com](mailto:634843639@qq.com). Defendant RDG accepts payments through [www.amazon.com](http://www.amazon.com).

12. Defendant NPK (“NPK”) is a Chinese business entity. Defendant NPK copies sculptures owned by Bountiful Baby and lists them for sale on [www.aliexpress.com](http://www.aliexpress.com). Defendant NPK accepts payments through [www.aliexpress.com](http://www.aliexpress.com) and corresponds with customers through [www.aliexpress.com](http://www.aliexpress.com) and email addresses at [sales@npk.com.cn](mailto:sales@npk.com.cn) and [npkdolls@gmail.com](mailto:npkdolls@gmail.com).

## **JURISDICTION**

13. This Court has subject matter jurisdiction under 17 U.S.C. § 411(a) (action arising under the Copyright Act); 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1337 (supplemental jurisdiction).

14. This Court also has personal jurisdiction over each of the Defendants because they have committed acts of copyright infringement in violation of 17 U.S.C. § 106 in this Judicial District, targeted Bountiful Baby in this Judicial District, and because Defendants have placed infringing products into the stream of commerce with the knowledge or understanding that such products are sold in the State of Utah and in this Judicial District. In addition, the acts by Defendants are targeted to cause commercial injury to Bountiful Baby in this Judicial District. In addition, Defendants derive substantial revenue from their sale of infringing products within this Judicial District and in the United States, expect their actions to have consequences within this Judicial District, and derive substantial revenue from interstate and international commerce directed both to and from this Judicial District. Moreover, an exercise of personal jurisdiction over each of the Defendants is proper under Utah's Long Arm Statute, Utah Code Ann § 78-27-22, and an exercise of personal jurisdiction over the Chinese Defendants is proper under Federal Rule of Civil Procedure 4(k)(2).

## **VENUE**

15. Defendants are individuals or entities subject to personal jurisdiction in this District. Venue is proper in this District under 28 U.S.C. § 1331(b) because a substantial part of the events giving rise to this claim took place in this District: Defendants transact business within this district and Bountiful Baby has suffered harm in this District. Venue is proper in this district

under 28 U.S.C. § 1391(b)(3) because certain Defendants are individuals whose names and addresses of residence are unknown that are otherwise subject to personal jurisdiction in this District. Venue is also proper in this judicial district under 28 U.S.C. § 1391(c)(3) because certain of the Defendants are foreign persons or corporations subject to personal jurisdiction in this District.

## BACKGROUND

16. Started in 2001, Bountiful Baby is a world-leading manufacturer of Realborn® reborn doll kits and supplies, which it sells on its website [www.BountifulBaby.com](http://www.BountifulBaby.com). Bountiful Baby is a Utah-based limited liability company with its headquarters in West Valley City, Utah. Bountiful Baby operates the world's largest reborn doll supply store. Bountiful Baby protects the sculptures and images of the infant models for its reborn doll designs with the U.S. Copyright Office.

17. The Defendant OTD and Defendant NPK are related as shown in this exemplary listing at [www.amazon.com](http://www.amazon.com).



NPKDOLL Sleeping Realistic Reborn Baby Dolls Girl Cute Soft Vinyl Silicone Dolls Weighted Baby Reborn Dolls Handmade Newborn Baby Dolls with Clothes

Visit the OtardDolls Store 399 ratings | 27 answered questions

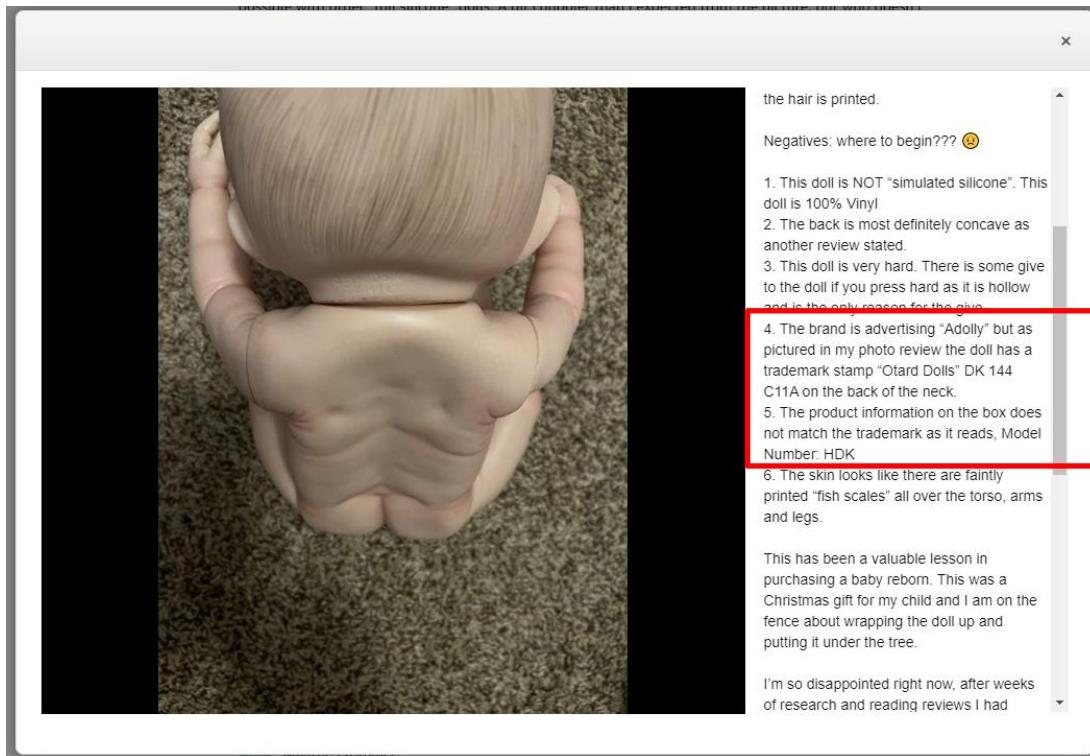
**\$69<sup>99</sup>**  
-22% **\$69<sup>99</sup>**  
List Price: ~~\$89.99~~ & FREE Returns

**In Stock.** Qty: 1 Add to Cart Buy Now

Secure transaction  
Ships from Amazon  
Sold by TATU doll  
Packaging Shows what's inside. T...  
Details  
Return policy: Eligible for Return, Refund or Replacement

(Exhibit A)

18. Upon information and belief, Defendant OTD and Defendant ADUS are related as shown in this exemplary listing at [www.amazon.com](http://www.amazon.com).



(Exhibit B)

19. Bountiful Baby owns United States Copyright Registration No. VA0002269514 for the reborn doll infant sculpture known as “3 Month Joseph Sleeping Head” (the “Joseph 3M Sleeping Head Sculpture”), VA0002269515 for the reborn doll infant sculpture known as “3 Month Joseph Arms” (the “Joseph 3M Arms”), and VA0002268599 for the reborn doll infant sculpture known as “3 Month Joseph Legs” (the “Joseph 3M Legs”). The Joseph 3M Sleeping Head Sculpture, the Joseph 3M Arms, and the Joseph 3M Legs are collectively referred to as the “Joseph 3M Sleeping Sculptures.”

**Copyrighted Joseph 3M  
Sleeping Head  
Sculpture**



**Copyrighted Joseph  
3M Arms**



**Copyrighted Joseph 3M  
Legs**



**Exemplary “Joseph 3M Sleeping” Sculptures**



20. Defendant ADC has willfully and knowingly created at least 3 infringing reborn dolls based on the copyrighted Joseph 3M Sleep Sculptures as shown in these exemplary listings from [www.adolly.com](http://www.adolly.com).

Adolly  Search our store

HOME NEWEST BESTSELLERS Buy Dolls Get Outfit SHOP BUY ON AMAZON BLOGS

ORDER DOLLS \$79+ GET A FREE OUTFIT CHRISTMAS OUTFITS FROM \$15.99

Home > Newest > Adolly \* Gallery 18 inch Realistic Reborn Baby White Bow Sleeping Doll Ethan



**Adolly \* Gallery 18 inch Realistic Reborn Baby White Bow Sleeping Doll Ethan**

**\$79.99** \$159.99

by Adolly's Store

Quantity

Add to Cart

Buy with **PayPal**

More payment options

Share   

Adolly  Search our store

HOME NEWEST BESTSELLERS Buy Dolls Get Outfit SHOP BUY ON AMAZON BLOGS

ORDER DOLLS \$79+ GET A FREE OUTFIT CHRISTMAS OUTFITS FROM \$15.99

Home > Newest > Adolly \* Gallery 18 inch Realistic Reborn Baby Baseball Doll Ethan



**Adolly \* Gallery 18 inch Realistic Reborn Baby Baseball Doll Ethan**

**\$79.99** \$129.99

by Adolly's Store

Quantity

Add to Cart

Buy with **PayPal**

More payment options

Share   



(Exhibit C)

21. The Defendant ADUS has willfully and knowingly created at least 3 infringing reborn dolls based on the copyrighted Joseph 3M Sleep Sculptures as shown in these exemplary listings from [www.amazon.com](http://www.amazon.com).

The screenshot shows an Amazon product listing for a reborn baby doll. The main image is a close-up of the doll's face, wearing a white lace bonnet and a white outfit with a pacifier. The product title is 'Adolly Gallery 18 inches Reborn Baby Dolls Lifelike Realistic Silicone Vinyl Newborn Dolls Cute Toy Gifts Set for Age 3+ White Bow ad18C16 Name Ethan'. It is listed at \$89.99. The listing includes details such as Brand: Adolly, Age Range: Over 3 years old, Model Name: Adolly Gallery, Material: Soft Simulation Silicone Vinyl, and Collection Name: Reborn baby doll. There are buttons for 'Add to Cart' and 'Buy Now'.

amazon Hello Select your address Toys & Games ▾

All Best Sellers Amazon Basics New Releases Customer Service Today's Deals Prime - Amazon Home Books Music Registry Fashion Kindle Books Gift Cards Toys & Games Sell Shopper Toolkit

Toys & Games Holiday Toy List Shop Toys by Age Shop Toys by Character Shop Best Selling Toys Shop Newly Released Toys Shop Amazon Exclusive Toys Shop Toys Deals Create a Birthday Gift List Create a Holiday Gift List

amazon live FEBRUARY BEAUTY HAUL with MARIANNA HEWITT Shop on amazon.com/live

Toys & Games > Dolls & Accessories > Dolls



**Adolly Gallery 18 inches Reborn Baby Dolls**  
Lifelike Realistic Silicone Vinyl Newborn Dolls  
Cute Toy Gifts Set for Age 3+ CQ18C15 Name Ethan  
Visit the Adolly Store

**\$89<sup>99</sup>**  
Get \$60 off instantly: Pay ~~\$29.99~~ \$89.99 upon approval for the Amazon Prime Store Card. No annual fee.

<b>Brand</b>	Adolly
<b>Age Range (Description)</b>	Over 3 years old
<b>Model Name</b>	Adolly Gallery

**\$89<sup>99</sup>**  
\$19.99 delivery March 18 April 8. Details  
Select delivery location  
**In stock.**  
Usually ships within 4 to 5 days  
Qty: 1 Add to Cart Buy Now  
Secure transaction  
Ships from Adolly US Sold by Adolly US

amazon Hello Select your address Toys & Games ▾

All Best Sellers Amazon Basics New Releases Customer Service Today's Deals Prime - Amazon Home Books Music Registry Fashion Kindle Books Gift Cards Toys & Games Sell Sign in

Toys & Games Holiday Toy List Shop Toys by Age Shop Toys by Character Shop Best Selling Toys Shop Newly Released Toys Shop Amazon Exclusive Toys Shop Toys Deals Create a Birthday Gift List Create a Holiday Gift List

Aori Black Reborn Baby Doll Purple Bassinet 18 inch... 5% off coupon ★★★★★ 195 \$54.99 prime

Toys & Games > Dolls & Accessories > Dolls



**Adolly Gallery Reborn Baby Dolls 24 Inch Real Life Big Realistic Newborn Baby Dolls, Cloth Body with Hair and Eyes Closed Christmas Santa Gift Set for Kids Age 3+ Ad24c10 Name Darcy**  
Visit the Adolly Store ★★★★★ 121 ratings | 34 answered questions

**\$109<sup>99</sup>**  
& FREE Returns  
Get \$60 off instantly: Pay ~~\$49.99~~ \$109.99 upon approval for the Amazon Prime Store Card. No annual fee.

<b>Color:</b>	Red Outfit
<b>Brand</b>	Adolly
<b>Item Dimensions</b>	24 x 5.5 x 9.45 inches

**\$109<sup>99</sup>**  
& FREE Returns  
FREE delivery Monday February 28  
Or fastest delivery Friday February 25. Order by 12 hrs 19 mins  
Select delivery location  
**In Stock.**  
Qty: 1 Add to Cart Buy Now  
Secure transaction  
Ships from Amazon Sold by Adolly US

## (Exhibit D)

22. Defendant OTD has willfully and knowingly created at least 5 infringing reborn dolls based on the copyrighted Joseph 3M Sleep Sculpture as shown in these exemplary listings from [www.aliexpress.com](http://www.aliexpress.com).

**AliExpress**

**OtardDolls Official Store**  97.3% Positive feedback 5898 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback

19" Bebe Reborn Baby Doll Realistic Newborn Toys For Children Boneca Renascida Brinquedo Para Crianças

★★★★★ 4.8 ✓ 16 Reviews 44 orders

Order before our sale ends

**US \$50.47** US \$100.95 -50%

Winter Sale Ends in Jan 14, 11:59 PM PT



Color: 19 Inch NW 0.8KGS  
19 Inch NW 0.8KGS

Quantity:

- 1 + 252 Pieces available

Delivery United States

**Free Shipping**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 11 More options

**AliExpress**

**OtardDolls Official Store**  97.3% Positive feedback 5898 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback

Reborn Dolls Realistic Bebe Boy Newborn Baby Toy For Childrenbrinquedo Bebê Renascido Boneca Renascida Brinquedo Para Crianças

★★★★★ 4.7 ✓ 13 Reviews 35 orders

Order before our sale ends

**US \$50.47 - 76.36** US \$100.95 -152.72 50% Off

Winter Sale Ends in Jan 14, 11:59 PM PT



Color:



Quantity:

- 1 + 861 Pieces available

Delivery United States

**Free Shipping**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 11 More options

**AliExpress** **OtardDolls Official Store** + [+ Follow](#)  
97.3% Positive feedback **5902 Followers**

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback

19" Reborn Dolls Realistic Newborn Baby Toys For Children Boneca Renascida Brinquedo Bebe Para Crianças

★★★★★ 5.0 ~ 4 Reviews 9 orders

Order before our sale ends **US \$50.47** US \$100.95 -50% **Winter Sale** Ends in 2 d 17 : 44 : 18

Color: 19 Inch NW 0.8KGS **19 Inch NW 0.8KGS**

Quantity: 1 290 Pieces available

Delivery United States [More options](#)

**Free Shipping**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12

**Buy Now** **Add to Cart** **50**

**75-Day Buyer Protection** Money back guarantee **Free Return** Return for any reason within 15 days

5 thumbnail images of the doll in various poses.

**AliExpress** **OtardDolls Official Store** + [+ Follow](#)  
97.3% Positive feedback **5898 Followers**

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback

24" Reborn Doll Newborn Baby Toy For Children Soft Vinyl Silicone Boneca Renascida Brinquedo Bebe

★★★★★ 4.7 ~ 34 Reviews 82 orders

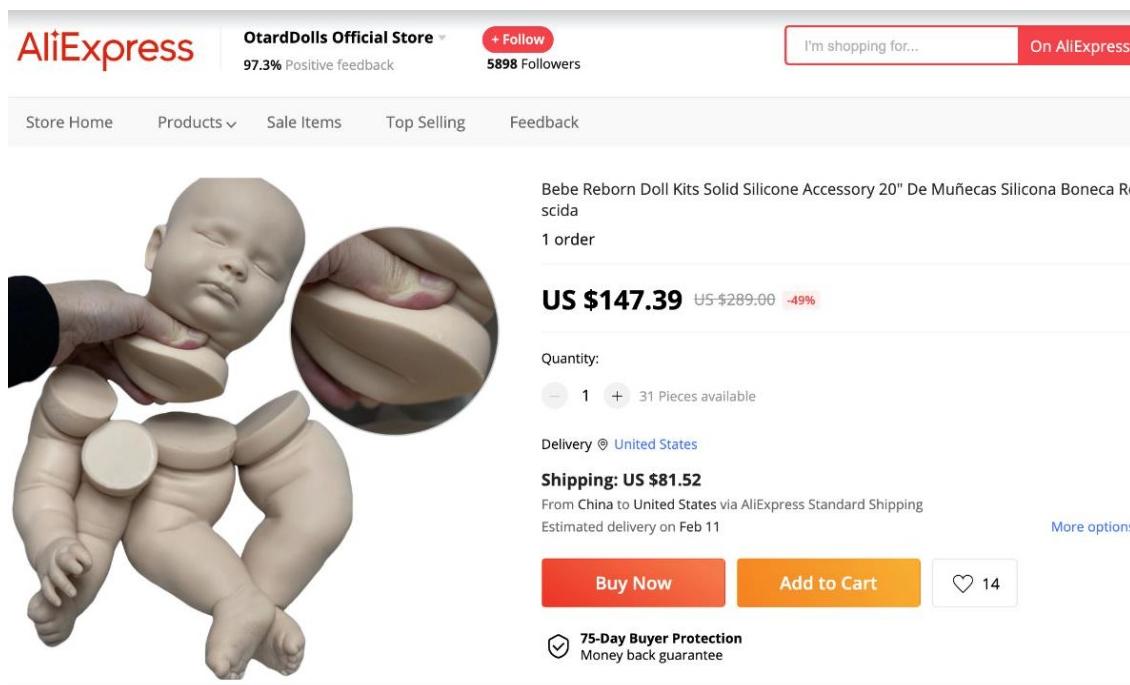
Order before our sale ends **US \$76.36** US \$152.72 -50% **Winter Sale** Ends in Jan 14, 11:59 PM PT

Color: NetWeight1. 4kgs **NetWeight1. 4kgs**

Quantity: 1 243 Pieces available

Delivery United States [More options](#)

**Free Shipping**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 11



(Exhibit E)

23. Defendant NPK has willfully and knowingly created at least 7 infringing reborn dolls based on the copyrighted Joseph 3M Sleep Sculpture as shown in these exemplary listings from [www.aliexpress.com](http://www.aliexpress.com).



NPK Official Store

Top Brand 94.5% Positive feedback

+ Follow

41306 Followers

I'm shopping for...

On AliExpress

Store Home

Products

Sale Items

Top Selling

ship from Russia

ship from Spain

DIY blank reborn doll kit

Feedback



NPK 50CM Full Body Silicone Reborn Baby Boy Sleeping Joseph Doll Rooted Hair 100% Hand Painted doll with Genesis Paint Multiple

★★★★★ 5.0 ✓ 1 Review 3 orders

**US \$58.82** US-\$90.49 -35%

US \$3.00 off on US \$300.00 Get coupons

Size: 50cm

50cm

Quantity:

1 + 497 Pieces available

Delivery @ United States

**Free Shipping**From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12

More options



NPK Official Store

Top Brand 94.5% Positive feedback

+ Follow

41306 Followers

I'm shopping for...

On AliExpress

Store Home

Products

Sale Items

Top Selling

ship from Russia

ship from Spain

DIY blank reborn doll kit

Feedback



NPK 60CM Finished Doll Sleeping Joseph As Picture Reborn Baby Doll Hand Paint Doll with Genesis Paint High Quality 3D skin Doll

★★★★★ 5.0 ✓ 2 Reviews 60 orders

**US \$58.86** US-\$109.00 -46%

US \$3.00 off on US \$300.00 Get coupons

Size: 60cm

60cm

Quantity:

1 + 443 Pieces available

Delivery @ United States

**Shipping: US \$4.21**From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12

More options

**AliExpress**

NPK Official Store  41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 60CM Big Boy 3 Month Size 100% handmade Reborn Toddler Sleeping Joseph Baby Doll Multiple Layers Painting with Visible Veins

★★★★★ 4.9 ✓ 21 Reviews 61 orders

**US \$63.55** US-\$111.50 -43%

US \$3.00 off on US \$300.00 Get coupons

Size: 60cm **60cm**

Quantity:

1 + 435 Pieces available

Delivery United States

**Free Shipping**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12 More options

**AliExpress**

NPK Official Store  41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 60CM Reborn Sleeping Joseph Toddler Size Cute Fat Baby Boy Doll Hand-made Doll with 3D Look Visible Veins Collectible doll

★★★★★ 5.0 ✓ 4 Reviews 7 orders

**US \$62.88** US-\$104.80 -40%

US \$3.00 off on US \$300.00 Get coupons

Size: 60cm **60cm**

Quantity:

1 + 493 Pieces available

Delivery United States

**Free Shipping**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12 More options

**AliExpress**

**NPK Official Store** Top Brand 94.5% Positive feedback

+ Follow **41306 Followers**

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



24inch Finished Doll Already Painted Kits Joseph Asleep Very Lifelike With Many Details Veins same As picture with Extra Body  
2 orders

**US \$36.57** US \$69.00 -47%

**US \$3.00 off on US \$30.00** Get coupons

Color: kit with cloth body  
**kit with cloth body**

Size: 24inch  
**24inch**

Quantity:  
1 + 498 Pieces available

Delivery United States

**Shipping: US \$4.21**

**AliExpress**

**NPK Official Store** Top Brand 94.5% Positive feedback

+ Follow **41306 Followers**

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 20inch Reborn Doll Kit Full Body Silicoc Sleeping Joseph Fresh Color Soft Touch

**US \$41.40** US \$69.00 -40%

**US \$3.00 off on US \$30.00** Get coupons

Color: kit with full body  
**kit with full body**

Size: 20inch  
**20inch**

Quantity:  
1 + 500 Pieces available

Delivery United States

**Shipping: US \$4.21**

From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12

More options

AliExpress

NPK Official Store •  
Top Brand 94.5% Positive feedback

+ Follow  
41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 23Inch Reborn Baby Doll Kit Lifelike 3 Month Toddler Sleeping Joseph Vinyl Unpainted Unfinished Doll Parts DIY Blank Doll Kit

1 order

**US \$34.85** US-\$85.00 -59%

US \$3.00 off on US \$300.00 Get coupons

Color: doll kit with body  
**doll kit with body**

Size: 23inch  
**23inch**

Quantity:  
1 + 499 Pieces available

Delivery United States

Shipping: US \$4.21

(Exhibit F)

24. Bountiful Baby owns United States Copyright Registration Nos. VA0002269513 for the reborn doll infant sculpture known as “3 Month Joseph Awake Head” (the “Joseph 3M Awake Head Sculpture”). The Joseph 3M Awake Head Sculpture, the Joseph 3M Arms, and the Joseph 3M Legs are collectively referred to as the “Joseph 3M Awake Sculptures.

**Copyrighted Joseph 3M  
Awake Head Sculpture**



**Copyrighted Joseph  
3M Arms**



**Copyrighted Joseph 3M  
Legs**



**Exemplary “Joseph 3M Awake”  
Sculptures**



25. Defendant ADC has willfully and knowingly created at least 1 infringing reborn doll based on the copyrighted Joseph 3M Awake Sculptures as shown in this exemplary listing from [www.adolly.com](http://www.adolly.com).

 Adolly

Newest Bestsellers Shop Free Shipping On U.S.A. Blog FAQs

CODE: NEW10 (10% OFF) REBORN OUTFITS FROM \$15.99 Join Birthday Club

Home > Newest > Adolly \* Gallery 24 inch Lifelike Reborn Baby Doll Name Carson



**Adolly \* Gallery 24 inch Lifelike Reborn Baby Doll Name Carson**  
★★★★★ 2 reviews  
**\$122.99** ~~\$199.99~~

by Adolly's Store

Quantity

Add to Cart

Buy it now

Share   

(Exhibit G)

26. The Defendant ADUS has willfully and knowingly created at least 1 infringing reborn doll based on the copyrighted Joseph 3M Awake Sculptures as shown in this exemplary listing from [www.amazon.com](http://www.amazon.com).



(Exhibit H)

27. Defendant OTD has willfully and knowingly created at least 2 infringing reborn dolls based on the copyrighted Joseph 3M Awake Sculptures as shown in this exemplary listing from [www.aliexpress.com](http://www.aliexpress.com).





(Exhibit I)

28. Defendant RDG has willfully and knowingly created at least 4 infringing reborn dolls based on the copyrighted Joseph 3M Awake Sculptures as shown in this exemplary listing from [www.amazon.com](http://www.amazon.com).

amazon Hello Select your address All 24 inch reborn

All Amazon Basics Browsing History Today's Deals Customer Service Pet Supplies Shopper Toolkit Beauty & Personal Care Amazon Home Coupons Find a Gift No annual fee

Toys & Games Holiday Toy List Shop Toys by Age Shop Toys by Character Shop Best Selling Toys Shop Newly Released Toys Shop Amazon Exclusive Toys Shop Toys Deals Create a Birthday Gift List Create a Holiday Gift List Sponsored

Na Na Na Surprise Teens Slumber Party Soft Fabric Fashion... ★★★★★ 291 \$35.99 prime

Toys & Games > Dolls & Accessories > Dolls

**Brand:** Generic  
**Reborn Baby Dolls 24 Inch Real Life Big Realistic Newborn Baby Dolls, Cloth Body Dolls with Painted Hair Gift Set for Kids Age 3+ 1NP2404**

**\$99.99**

Get a \$100 Amazon.com Gift Card upon approval for the Amazon Business American Express Card. Terms apply.

**Brand** Generic  
**Item Dimensions** 26 x 9.45 x 5.51 inches  
**LxWxH**  
**Age Range (Description)** Over 3 years old  
**Material** Vinyl  
**Collection Name** Reborn baby doll

**About this item**

- Realistic Design: Made of high quality soft simulation silicone vinyl with cloth body. Acrylic eyes open with hand-applied eyelashes which can't close or blink. Gentle touch with 1.2kg(2.6lb) weight. Can not put into water or bathe with your baby. A feeding bottle and toy pacifier fitting

**\$99.99**  
\$5.99 delivery February 2 - 24. Details  
Or fastest delivery January 18 - 21. Details  
Select delivery location  
In stock. Usually ships within 4 to 5 days.  
Qty: 1 Add to Cart Buy Now Secure transaction  
Ships from Reborn Doll Gallery Sold by Reborn Doll Gallery Return policy: Eligible for Return, Refund or Replacement.  
Add to List Add to Registry & Gifting

amazon Hello Select your address All 24 inch reborn

All Amazon Basics Browsing History Today's Deals Customer Service Pet Supplies Shopper Toolkit Beauty & Personal Care Amazon Home Coupons Find a Gift No annual credit card fee Sponsored

Na Na Na Surprise Teens Slumber Party Soft Fabric Fashion... ★★★★★ 291 \$35.99 prime

Toys & Games > Dolls & Accessories > Dolls

**Brand:** Generic  
**Reborn Baby Dolls 24 Inch Real Life Big Realistic Newborn Baby Dolls, Cloth Body Dolls with Rooted Fiber Hair Gift Set for Kids Age 3+ 1NP2408**

**\$99.99**

Get a \$100 Amazon.com Gift Card upon approval for the Amazon Business American Express Card. Terms apply.

**Brand** Generic  
**Item Dimensions** 26 x 9.45 x 5.51 inches  
**LxWxH**  
**Age Range (Description)** Over 3 years old  
**Material** Vinyl  
**Collection Name** Reborn baby doll

**About this item**

- Realistic Design: Made of high quality soft simulation silicone vinyl with cloth body. Acrylic eyes open with hand-applied eyelashes which can't close or blink. Gentle touch with 1.2kg(2.6lb) weight. Can not put into water or bathe with your baby. A feeding bottle and toy pacifier fitting

**\$99.99**  
\$5.99 delivery February 2 - 24. Details  
Or fastest delivery January 18 - 21. Details  
Select delivery location  
In stock. Usually ships within 4 to 5 days.  
Qty: 1 Add to Cart Buy Now Secure transaction  
Ships from Reborn Doll Gallery Sold by Reborn Doll Gallery Return policy: Eligible for Return, Refund or Replacement.  
Add to List Add to Registry & Gifting

**Amazon.com** Hello, Nevin Select your address All ⚙️ All Amazon Basics Browsing History Today's Deals Customer Service Pet Supplies Shopper Toolkit Beauty & Personal Care Amazon Home Coupons Find a Gift No annual fee

Na Na Na Surprise Teens Slumber Party Soft Fabric Fashion... ★★★★★ 291 \$35.99 prime Sponsored

Toys & Games > Dolls & Accessories > Dolls



Roll over image to zoom in

**Brand: Generic**

**Reborn Baby Dolls 24 Inch Real Life Big Realistic Newborn Baby Dolls, Cloth Body Dolls with Rooted Fiber Hair Gift Set for Kids Age 3+ 1NP2409**

**\$99.99**

Get a \$100 Amazon.com Gift Card upon approval for the Amazon Business American Express Card. Terms apply.

<b>Brand</b>	Generic
<b>Item Dimensions</b>	26 x 9.45 x 5.51 inches
<b>LxWxH</b>	
<b>Age Range (Description)</b>	Over 3 years old
<b>Material</b>	Vinyl
<b>Collection Name</b>	Reborn baby doll

**About this item**

- Realistic Design: Made of high quality soft simulation silicone vinyl with cloth body. Acrylic eyes open with hand-applied eyelashes which can't close or blink. Gentle touch with 1.2kg(2.6lb) weight. Can not put into water or bathe with your baby. A feeding bottle and toy pacifier fitting the mouth are included to bring more fun to your babies

**\$99.99**

Get a \$100 Amazon.com Gift Card upon approval for the Amazon Business American Express Card. Terms apply.

<b>Brand</b>	Generic
<b>Item Dimensions</b>	26 x 9.45 x 5.51 inches
<b>LxWxH</b>	
<b>Age Range (Description)</b>	Over 3 years old
<b>Material</b>	Vinyl
<b>Collection Name</b>	Reborn baby doll

**About this item**

- Realistic Design: Made of high quality soft simulation silicone vinyl with cloth body. Acrylic eyes open with hand-applied eyelashes which can't close or blink. Gentle touch with 1.2kg(2.6lb) weight. Can not put into water or bathe with your baby. A feeding bottle and toy pacifier fitting the mouth are included to bring more fun to your babies
- Lifelike Newborn Baby Doll: This amazing adolly reborn baby is 24 inches from head to toe, feels wonderfully lifelike with a weighted cloth body filled with cotton. Feature hand-painted face, toes, and hand-sewn

**\$99.99**

\$5.99 delivery February 2 - 24. Details Or fastest delivery January 18 - 21. Details

© Select delivery location In stock. Usually ships within 4 to 5 days.

Qty: 1 Add to Cart Buy Now Secure transaction

Ships from Reborn Doll Gallery Sold by Reborn Doll Gallery

Return policy: Eligible for Return, Refund or Replacement.

Add to List Add to Registry & Gifting

Share Email Facebook Twitter Pinterest Have one to sell?

(Exhibit J)

29. Defendant NPK has willfully and knowingly created at least 3 infringing reborn dolls based on the copyrighted Joseph 3M Awake Sculpture as shown in these exemplary listings from [www.aliexpress.com](http://www.aliexpress.com).

NPK Official Store Top Brand 94.5% Positive feedback

+ Follow 41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback

**NPK 60CM Reborn Joseph Awake Cute Fat Baby Boy Doll Top Quality Hand-made Doll with Hand-rooted brown hair**

★★★★★ 4.0 ✓ 1 Review 23 orders

**US \$64.88** US-\$104.65 -38%

US \$3.00 off on US \$300.00 Get coupons

Color: blue eyes brown eyes

Size: 60cm 60cm

Quantity: 1 + 978 Pieces available

Delivery United States

NPK Official Store Top Brand 94.5% Positive feedback

+ Follow 41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback

**NPK 60CM Huge 3 Month Size 100% handmade Reborn Toddler Baby Boy Joseph Awake Doll Mutiple Layers Painting with Visible Veins**

★★★★★ 4.6 ✓ 10 Reviews 20 orders

**US \$63.55** US-\$111.50 -43%

US \$3.00 off on US \$300.00 Get coupons

Color: blue eyes brown eyes

Size: 60cm 60cm

Quantity: 1 + 970 Pieces available

Delivery United States

**AliExpress**

**NPK Official Store**  41306 Followers  
Top Brand 94.5% Positive feedback

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 60CM Reborn Joseph Awake Toddler Size Cute Fat Baby Boy Doll Top Quliaty Hand-made Doll with Rooted hair doll

★★★ 2.3 ✓ 3 Reviews 4 orders

**US \$62.88** US \$104.80 -40%

US \$3.00 off on US \$300.00 Get coupons

Color:

Size: 60cm

Quantity:  1  + 991 Pieces available

Delivery  United States

**AliExpress**

**NPK Official Store**  41306 Followers  
Top Brand 94.5% Positive feedback

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 50CM Full Body Silicone Reborn Baby Boy Joseph Awake Doll Rooted Hair 100% Hand Painted doll 3D Skin with Visible Veins

**US \$58.81** US \$90.47 -35%

US \$3.00 off on US \$300.00 Get coupons

Color:

Size: 20inch

Quantity:  1  + 1000 Pieces available

Delivery  United States

**Free Shipping**  
From China to United States via AliExpress Standard Shipping

NPK Official Store Top Brand 94.5% Positive feedback

+ Follow 41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback

**NPK 23Inch Reborn Baby Doll Kit Lifelike Newborn 3 Month Joseph Awake Vinyl Unpainted Unfinished Doll Parts DIY Blank Doll Kit**

**US \$34.85** US \$85.00 -59%

**US \$3.00 off on US \$300.00** Get coupons

**Color:** doll kit with body  
doll kit with body

**Size:** 23Inch  
23Inch

**Quantity:**  
1 + 500 Pieces available

Delivery United States

**Shipping: US \$4.21**  
From China to United States via AliExpress Standard Shipping

(Exhibit K)

30. Bountiful Baby owns United States Copyright Registration Nos. VA0002268423 for the reborn infant sculpture known as “Nod Head” (the “Nod Head Sculpture”), VA0002265479 for the reborn infant sculpture known as “Nod Arms” (the “Nod Arms Sculpture”), and VA0002265489 for the reborn infant sculpture known as “Nod Legs” (the “Nod Legs Sculptures”). The Nod Head Sculpture, the Nod Arms Sculpture, and the Nod Legs Sculpture are collectively referred to as the “Nod Sculptures.”

**Copyrighted Nod Head  
Sculpture**



**Copyrighted Nod Arms  
Sculpture**



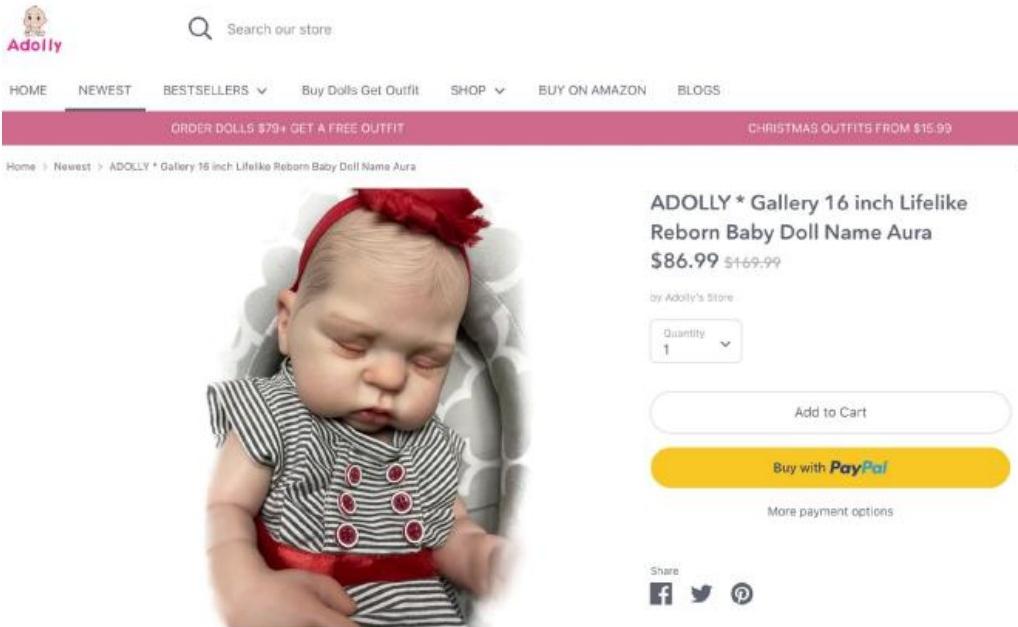
**Copyrighted Nod Legs  
Sculpture**



**Exemplary Nod Sculptures**



31. Defendant ADS has willfully and knowingly created at least 1 infringing reborn doll based on the copyrighted Nod Sculptures as shown in this exemplary listing from [www.adolly.com](http://www.adolly.com).



(Exhibit L)

32. Defendant OTD has willfully and knowingly created at least 3 infringing reborn dolls based on the copyrighted Nod Sculptures as shown in this exemplary listing from

[www.aliexpress.com.](http://www.aliexpress.com)

AliExpress

OtardDolls Official Store  97.3% Positive feedback 5903 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback



Solid Silicone Doll Girl 18" Soft Newborn Bebe Reborn Full Body Baby Menina Macia Recém-nascido De Corpo Inteiro

★ ★ ★ ★ 3.0 2 Reviews 11 orders

**US \$175.78** US \$374.00 -53%

Ships From: CN

CN

Quantity:

- 1 + 90 Pieces available

Delivery  United States

**Shipping: US \$91.62**

From China to United States via AliExpress Standard Shipping

Estimated delivery on Feb 12

More options

Buy Now Add to Cart  194

AliExpress

OtardDolls Official Store  97.3% Positive feedback 5903 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback



Reborn Baby Doll Full Body Vinyl Bebe Closed Eyes Girl Newborn Menina Boneca Re nascida Lifelike Real Soft Touch Cuddly Toddler

★★★★★ 5.0 4 Reviews 12 orders

**US \$32.00** US \$88.90 -64%

Quantity:

- 1 + 87 Pieces available

Delivery  United States

**Shipping: US \$16.33**

From China to United States via AliExpress Standard Shipping

Estimated delivery on Feb 12

More options

Buy Now Add to Cart  77

 **75-Day Buyer Protection**  
Money back guarantee

 **Free Return**  
Return for any reason within 15 days

Doll Reborn Baby Full Body Vinyl Bebe Closed Eyes Boy Newborn Menina Boneca Re  
nascida Lifelike Real Soft Touch Cuddly Toddler

★★★★★ 4.5 ✓ 2 Reviews 3 orders

**US \$32.00** US-\$88.90 -64%

Quantity: 1 / 97 Pieces available

Delivery United States

**Shipping: US \$16.33**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12

More options

**Buy Now** **Add to Cart** **78**

75-Day Buyer Protection Money back guarantee **Free Return** Return for any reason within 15 days

(Exhibit M)

33. Bountiful Baby owns United States Copyright Registration Nos. VA0002255282 for the reborn doll infant sculpture known as “Darren Sleeping Head” (the “Darren Sleeping Head Sculpture”), VA0002281257 for the reborn doll infant sculpture known as “Darren Awake Asleep Arms” (the “Darren Arms Sculpture”), and VA0002281255 for the reborn doll infant sculpture known as “Darren Awake Asleep Legs” (the “Darren Legs Sculpture”). The Darren Sleeping Head Sculpture, the Darren Arms Sculpture, and the Darren Legs Sculpture are collectively referred to as the “Darren Sculptures.”

**Copyrighted Darren  
Sleeping Head Sculpture**



**Copyrighted Darren Arms  
Sculpture**



**Copyrighted Darren Legs  
Sculpture**



**Exemplary “Darren” Sculptures**



34. Defendant ADC has willfully and knowingly created at least 2 additional infringing reborn doll based on the copyrighted Darren Sleep Sculpture as shown in these exemplary listings from [www.adolly.com](http://www.adolly.com):

  
**Adolly**

Newest Bestsellers ▾ Shop ▾ Free Shipping On U.S.A. Blog FAQs

CODE: NEW10 (10% OFF) REBORN OUTFITS FROM \$15.99 Join Birthday Club

Home > Newest > Adolly \* Gallery 18 inch Lifelike Reborn Baby Doll Name Lucius



**Adolly \* Gallery 18 inch Lifelike Reborn Baby Doll Name Lucius**  
**\$89.99 \$105.99**

by Adolly's Store

Quantity

Add to Cart

Share   

  
Search our store

HOME NEWEST BESTSELLERS ▾ Buy Dolls Get Outfit SHOP ▾ BUY ON AMAZON BLOGS

ORDER DOLLS \$79+ GET A FREE OUTFIT! CHRISTMAS OUTFITS FROM \$15.99

Home > Newest > Adolly \* Collection Adolly 20 inch Lifelike Reborn Baby Doll Name Violet



**Adolly \* Collection Adolly 20 inch Lifelike Reborn Baby Doll Name Violet**  
**\$299.99 \$369.99**

by Adolly's Store

Quantity

Add to Cart

More payment options

(Exhibit N)

35. Defendant OTD has willfully and knowingly created at least 5 additional infringing reborn dolls based on the copyrighted Darren Sleep Sculpture as shown in these exemplary listings from [www.aliexpress.com](http://www.aliexpress.com).

The screenshot shows the AliExpress store page for "OtardDolls Official Store". The store has 97.3% positive feedback and 5903 followers. The main product listed is a "Reborn Doll Kits Vinyl Baby Newborn Darren With Cloth Body Unpainted Parts DIY Blank Accessories De Boneca Acessórios". It has a 4.5 rating from 4 reviews and 20 orders. The price is US \$9.64, down from \$68.07 (-86%). The quantity is set to 1, with 64 pieces available. Delivery is to the United States. Shipping is US \$11.37 from China to the United States via AliExpress Standard Shipping, estimated delivery on Feb 12. There are "Buy Now" and "Add to Cart" buttons, and a heart icon showing 72 likes.

The screenshot shows another listing on the same AliExpress store page. The product is a "Silicone Kits Solid Silica Gel 18" Darren Sleeping De Muñecas Silicona Boneca Renascida". It has a 5.0 rating from 3 reviews and 9 orders. The price is US \$95.37, down from \$289.00 (-67%). The quantity is set to 1, with 299 pieces available. Delivery is to the United States. Shipping is US \$28.98 from China to the United States via AliExpress Standard Shipping, estimated delivery on Feb 12. There are "Buy Now" and "Add to Cart" buttons, and a heart icon showing 90 likes. Below the buttons are links for "75-Day Buyer Protection" (Money back guarantee) and "Free Return" (Return for any reason within 15 days).

AliExpress

OtardDolls Official Store • 97.3% Positive feedback + Follow 5903 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback



Reborn Dolls Bebe Silicone Newborn Baby Closed Eyes Solid Head Arms Legs 18" Boneca Renascida Brinquedo Para Crianças

**US \$172.04** US-\$374.00 -54%

Ships From: CN CN

Quantity: 1 94 Pieces available

Delivery United States Shipping: US \$71.41 From China to United States via AliExpress Standard Shipping Estimated delivery on Feb 12 More options

Buy Now Add to Cart 29

AliExpress

OtardDolls Official Store • 97.3% Positive feedback + Follow 5903 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback



Reborn Dolls 16" Lifelike Baby Toy For Children Gifts Boneca Renascida Brinquedo Bebe Para Crianças Menina

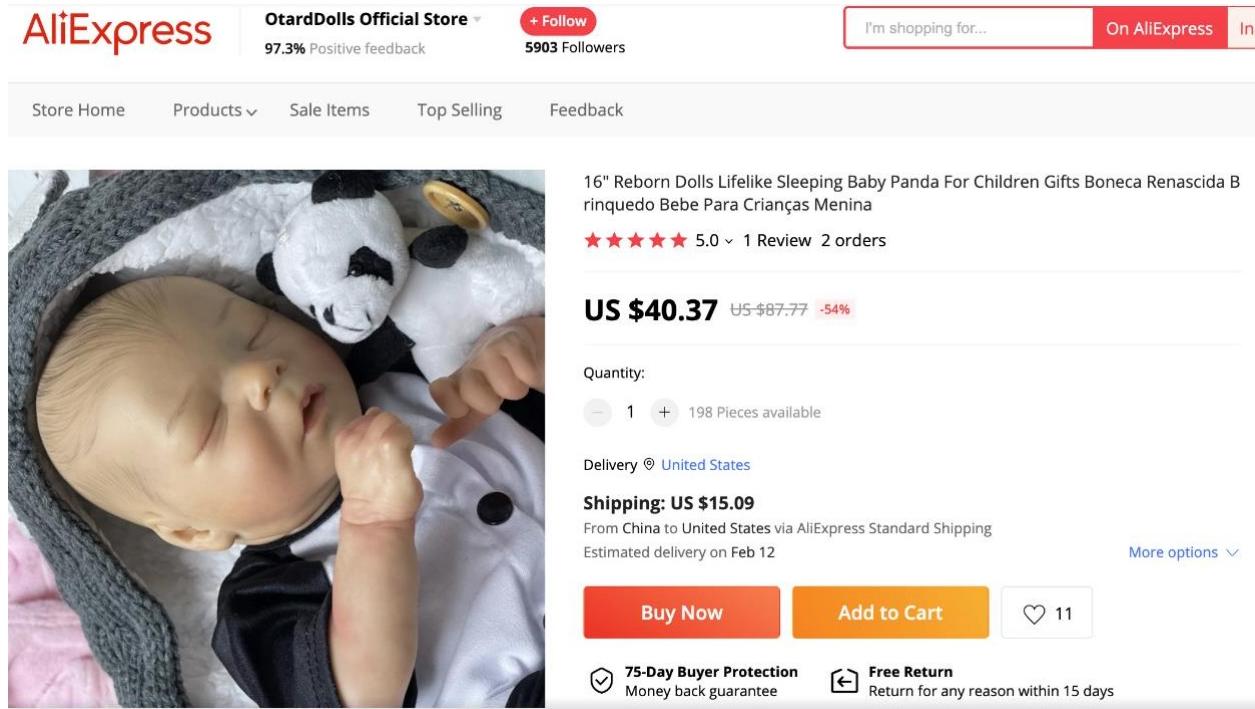
★★★★★ 4.9 ~ 83 Reviews 165 orders

**US \$25.81** US-\$57.35 -55%

Quantity: 1 20 Pieces available

Delivery United States Shipping: US \$15.09 From China to United States via AliExpress Standard Shipping Estimated delivery on Feb 12 More options

Buy Now Add to Cart 572



The screenshot shows a product listing on AliExpress. At the top, the AliExpress logo is on the left, followed by the store name "OtardDolls Official Store" with a "97.3% Positive feedback" badge and a "Follow" button. To the right is a search bar with "I'm shopping for..." and a "On AliExpress" button. Below the header is a navigation bar with links: "Store Home", "Products", "Sale Items", "Top Selling", and "Feedback".

The main content features a large image of a baby doll with a panda head, lying down. To its right is the product title: "16" Reborn Dolls Lifelike Sleeping Baby Panda For Children Gifts Boneca Renascida Brinquedo Bebe Para Crianças Menina". Below the title is a rating of "★★★★★ 5.0" from 1 review and 2 orders.

The price is listed as "US \$40.37" with a原价 of "US \$87.77" and a "-54%" discount. A "Quantity" selector shows "1" with "198 Pieces available".

Delivery information indicates "United States" with "From China to United States via AliExpress Standard Shipping" and an estimated delivery date of "Feb 12". There is a "More options" link.

At the bottom of the listing are three buttons: "Buy Now" (red), "Add to Cart" (orange), and a "Heart" icon with the number "11". Below these buttons are two badges: "75-Day Buyer Protection" (with a checkmark) and "Free Return" (with a return arrow icon).

(Exhibit O)

36. Defendant NPK has willfully and knowingly created at least 1 infringing reborn doll based on the copyrighted Darren Sculptures as shown in the exemplary listing from aliexpress.com.

NPK Official Store •  
Top Brand 94.2% Positive feedback  
+ Follow  
41928 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback

NPK 17inch Reborn Doll Kit Darren Sleeping & awake lifelike soft touch fresh Color  
2 orders

Fashion must-haves 2022

**US \$14.95**  
US \$65.00 77% Off

TREND SPOTTING Ends in 1 d 07 : 09 : 53

US \$2.50 Coupons For You US \$5.00 off on US \$500.00 Get coupons

Color:

Size: doll kit with body  
**doll kit with body**

Quantity:  
1 994 Pieces available

Ships to United States

**Shipping: US \$4.21**  
Free shipping for orders over US \$100.00 via the selected shipping method  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Apr 07 More options

Buy Now Add to Cart

(Exhibit P)

37. Bountiful Baby also owns United States Copyright Registration Nos. VA0002271682 for the reborn doll infant sculpture known as “Easton Head” (the “Easton Head Sculpture”), VA0002272482 for the reborn doll infant sculpture known as “Easton Arms” (the “Easton Arms Sculpture”), and VA0002272481 for the reborn doll infant sculpture known as “Easton Legs” (the “Easton Legs Sculpture”). The Easton Head Sculpture, the Easton Arms Sculpture, and the Easton Legs Sculpture are collectively referred to as the “Easton Sculptures”.

**Copyrighted Easton Head Sculpture**



**Copyrighted Easton Arms Sculpture**



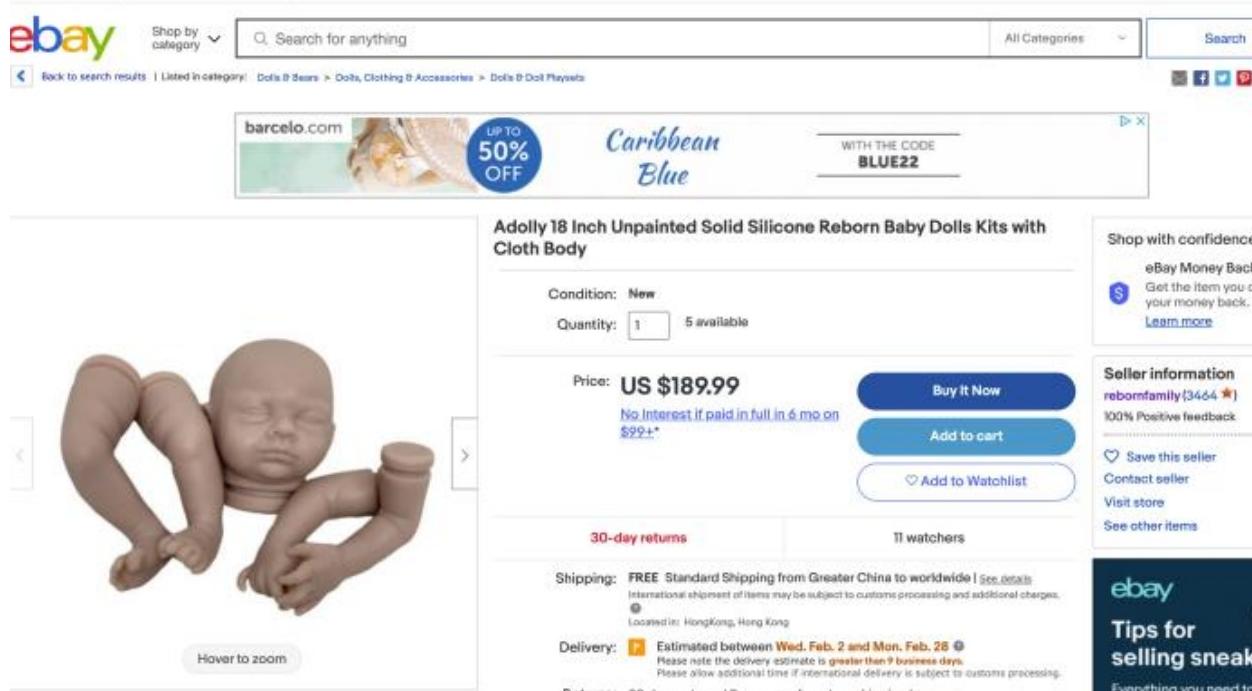
**Copyrighted Easton Legs Sculpture**



**Exemplary Easton Sculptures**



38. Defendant ADUS has willfully and knowingly created at least 3 infringing reborn doll works based on the copyrighted Easton Sculptures as shown in this exemplary listing from [www.ebay.com](http://www.ebay.com).



The screenshot shows an eBay product page for a "Adolly 18 Inch Unpainted Solid Silicone Reborn Baby Dolls Kits with Cloth Body". The main image displays a realistic reborn baby doll lying on its back. The listing includes the following details:

- Condition:** New
- Quantity:** 1 / 5 available
- Price:** US \$189.99
- Shipping:** FREE Standard Shipping from Greater China to worldwide (see details)
- Delivery:** Estimated between Wed, Feb. 2 and Mon, Feb. 28 (Please note the delivery estimate is greater than 9 business days)

On the right side of the page, there are sections for "Shop with confidence" (eBay Money Back), "Seller information" (rebornfamily [3464] with 100% positive feedback), and "ebay Tips for selling sneak".

(Exhibit Q)

39. Defendant OTD has willfully and knowingly created at least 1 infringing reborn doll based on the copyrighted Easton Sculptures as shown in this exemplary listing from [www.aliexpress.com](http://www.aliexpress.com).



The screenshot shows an AliExpress product page for a "18" Reborn Baby Dolls Realistic Newborn Toy For Children Boneca Renascida Brinquedo Bebe Para Crianças". The main image shows a reborn baby doll lying on its back. The listing includes the following details:

- Price:** US \$49.50 (US \$107.60 -54%)
- Quantity:** 1 / 100 Pieces available
- Delivery:** United States
- Shipping:** US \$21.28 (From China to United States via AliExpress Standard Shipping, Estimated delivery on Feb 12)

At the bottom, there are buttons for "Buy Now", "Add to Cart", and "75-Day Buyer Protection".

(Exhibit R)

40. Bountiful Baby also owns United States Copyright Registration Nos. VA0002284512 for the reborn doll infant sculpture known as “Elliot Head” (the “Elliot Head Sculpture”) and VA0002284359 for the reborn doll infant sculpture known as “Easton/Elliot/Grant/Michelle Arms” (the “Elliot Arms Sculpture”). The Elliot Head Sculpture and the Elliot Arms Sculpture are collectively referred to as the “Elliot Sculptures”).

**Copyrighted Elliot Head Sculpture**



**Copyrighted Elliot Arms Sculpture**



**Exemplary Elliot Sculptures**



41. Defendant OTD has willfully and knowingly created at least 1 infringing reborn

doll based on the copyrighted Elliot Sculptures as shown in this exemplary listing from [www.aliexpress.com](http://www.aliexpress.com).



**OtardDolls Official Store** [+ Follow](#) 97.3% Positive feedback 5903 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback

Silicone Reborn Doll Baby Boy Open Eyes Solid 16" Soft Newborn Bebe Full Body Me  
nina Macia Recém-nascido De Corpo Inteiro

★★★★★ 4.7 ✓ 3 Reviews 13 orders

**US \$172.04** US-\$374.00 -54%

Ships From: CN CN

Quantity: 1 + 87 Pieces available

Delivery United States Shipping: US \$81.52 From China to United States via AliExpress Standard Shipping Estimated delivery on Feb 12 More options

[Buy Now](#) [Add to Cart](#) [Heart 342](#)

(Exhibit S)

42. Bountiful Baby also owns United States Copyright Registration Nos. VA0002272484 for the reborn doll infant sculpture known as “Blinkin Head” (the “Blinkin Head Sculpture”), VA0002268524 for the reborn doll infant sculpture known as “Blinkin Arms” (the “Blinkin Arms Sculpture”), and VA0002268519 for the reborn doll infant sculpture known as “Blinkin Legs” (the “Blinkin Legs Sculpture”). The Blinkin Head, the Blinkin Arms, and the Blinkin Legs are collectively referred as the “Blinkin Sculptures”.

**Copyrighted Blinkin Head Sculpture**



**Copyrighted Blinkin Arms Sculpture**



**Copyrighted Easton Legs Sculpture**



**Exemplary Blinkin Sculptures**



43. Defendant ADC has willfully and knowingly created at least 2 infringing reborn dolls based on the copyrighted Blinkin Sculptures as shown in these exemplary listings from [www.adolly.com](http://www.adolly.com).

 Search our store

HOME NEWEST BESTSELLERS ▾ Buy Dolls Get Outfit SHOP ▾ BUY ON AMAZON BLOGS

ORDER DOLLS \$79+ GET A FREE OUTFIT CHRISTMAS OUTFITS FROM \$15.99

Home > Newest > Adolly \* Gallery Adolly 16 inch Lifelike Reborn Baby Doll Name Adah



**Adolly \* Gallery Adolly 16 inch Lifelike Reborn Baby Doll Name Adah**  
**\$86.99**

by Adolly's Store

Quantity

Add to Cart

Buy with **PayPal**

More payment options

Share   

 Search our store

HOME NEWEST BESTSELLERS ▾ Buy Dolls Get Outfit SHOP ▾ BUY ON AMAZON BLOGS

ORDER DOLLS \$79+ GET A FREE OUTFIT CHRISTMAS OUTFITS FROM \$15.99

Home > Newest > Adolly \* Gallery 16 inch Lifelike Reborn Baby Doll Name Riley



**Adolly \* Gallery 16 inch Lifelike Reborn Baby Doll Name Riley**  
**\$79.99**

by Adolly's Store

Quantity

Add to Cart

Buy with **PayPal**

More payment options

Share   

(Exhibit T)

44. Defendant OTD has willfully and knowingly created at least 2 infringing reborn dolls based on the copyrighted Blinkin Sculptures as shown in these exemplary listings from [www.aliexpress.com](http://www.aliexpress.com).

AliExpress

OtardDolls Official Store  97.3% Positive feedback 5903 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback



Reborn Dolls Full Body Vinyl Baby Bebe Open Eyes Girl Newborn Menina Boneca Re  
nascida Lifelike Real Soft Touch Cuddly Toddler

★★★★★ 5.0 ✓ 3 Reviews 5 orders

**US \$32.89** US-\$88.90 -63%

Quantity: 1 95 Pieces available

Delivery United States

**Shipping: US \$16.33**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12 More options

**Buy Now** **Add to Cart**  35

 75-Day Buyer Protection Money back guarantee  Free Return Return for any reason within 15 days

AliExpress

OtardDolls Official Store  97.3% Positive feedback 5903 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling Feedback



Reborn Baby Dolls Full Body Vinyl Bebe Open Eyes Boy Newborn Menina Boneca Re  
nascida Lifelike Real Soft Touch Cuddly Toddler

★★★★★ 4.6 ✓ 5 Reviews 10 orders

**US \$32.89** US-\$88.90 -63%

Quantity: 1 89 Pieces available

Delivery United States

**Shipping: US \$16.33**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12 More options

**Buy Now** **Add to Cart**  77

(Exhibit U)

45. Defendant NPK has willfully and knowingly created at least 2 infringing reborn dolls based on the copyrighted Blinkin Sculptures as shown in these exemplary listings from [www.aliexpress.com](http://www.aliexpress.com).

**AliExpress**

NPK Official Store  + Follow  
Top Brand 94.5% Positive feedback 41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 40CM Full Body Soft Silicone Bebe Doll Reborn Soft Touch waterproof Bath Toy Girl Doll Hand Detailed Painting Art Doll  
★★★★★ 4.0 9 Reviews 11 orders

**US \$37.80** US-\$70.00 -40%  
US \$3.00 off on US \$300.00 Get coupons

Color: blue eyes brown eyes  
Size: 40cm 40cm  
Quantity: 1 983 Pieces available

Delivery United States  
**Shipping: US \$4.21**  
From China to United States via AliExpress Standard Shipping

**AliExpress**

NPK Official Store  + Follow  
Top Brand 94.5% Positive feedback 41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 16inch Reborn Doll Kit Blinkin Full Body Soft Flexible Vinyl Unfinished Doll Parts with eyes  
**US \$33.50** US-\$67.00 -50%  
US \$3.00 off on US \$300.00 Get coupons

Size: 16inch 16inch  
Quantity: 1 500 Pieces available

Delivery United States  
**Free Shipping**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12 More options

**Buy Now** Add to Cart 

(Exhibit V)

46. Bountiful Baby also owns United States Copyright Registration Nos. VA0002255449 for the reborn doll infant sculpture known as “Skya Head Sleeping” (the “Skya

Head Sleeping Sculpture”), VA0002271944 for the reborn doll infant sculpture known as “Skya Awake/Asleep Arms” (the “Skya Arms Sculpture”) and VA0002271942 for the reborn doll infant sculpture known as “Skya Awake/Asleep Legs” (the “Skya Legs Sculpture”). The Skya Head Sleeping Sculptures, Sky Arms Sculpture, and the Skya Legs Sculpture are collectively referred to as the “Skya Sculptures.”

**Copyrighted Skya Head Sleeping Sculpture**



**Copyrighted Skya Arms Sculpture**



**Copyrighted Skya Legs Sculpture**



**Exemplary Skya Sculptures**



47. The Defendant NPK has willfully and knowingly created at least 2 infringing reborn doll on the copyrighted Skya Sculptures as shown in this exemplary listing from [www.aliexpress.com](http://www.aliexpress.com).

AliExpress

NPK Official Store  41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 48CM Newborn Baby Reborn Doll Skya Handmade 3D Skin with Genesis Paint Multiple Layers Veins Doll Real Picture  
2 orders

**US \$48.06** US-\$89.00 -46%

US \$3.00 off on US \$300.00 Get coupons

Size: 48cm **48cm**

Quantity:   1  498 Pieces available

Delivery  United States

**Shipping: US \$4.21**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12

More options ▾

AliExpress

NPK Official Store  41306 Followers

I'm shopping for... On AliExpress

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK 48CM Top Quality Hand-made Doll with 3D Skin Tone Visible Veins Newborn Si ze Bebe Doll Reborn Baby Skya Collectible Artdoll  
1 order

**US \$49.30** US-\$85.00 -42%

US \$3.00 off on US \$300.00 Get coupons

Size: 48cm **48cm**

Quantity:   1  499 Pieces available

Delivery  United States

**Shipping: US \$4.21**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12

More options ▾

(Exhibit W)

48. Bountiful Baby also owns United States Copyright Registration No. VA0002273961 for the reborn doll infant sculpture known as “Bindi Head” (the “Bindi Head Sculpture”), and VA0002277644 for the reborn doll infant sculpture known as “Bindi/Binki Legs” (the “Bindi Legs Sculpture”). The Bindi Head Sculpture and the Bindi Legs Sculpture are

collectively referred to as the “Bindi Sculptures.”

**Copyrighted Bindi Head Sculptures**



**Copyrighted Bindi Legs Sculpture**



**Exemplary Bindi Sculpture**



49. Defendant NPK has willfully and knowingly created at least 1 infringing reborn doll based on the copyrighted Bindi Sculptures as shown in this exemplary listing from aliexpress.com.



## (Exhibit X)

50. Bountiful Baby also owns United States Copyright Registration Nos. VA0002271799 for the reborn doll infant sculptures known as “Binki Head” (the “Binki Head Sculpture”). The Binki Head Sculpture and the Bindi/Binki Legs are collectively referred to as the “Binki Sculptures.”

**Copyrighted Binki Head Sculpture**



**Exemplary Binki Sculptures**



51. Defendant NPK has willfully and knowingly created at least 1 infringing reborn doll based on the copyrighted Binki Sculptures as shown in this exemplary listing from [www.aliexpress.com](http://www.aliexpress.com).

**AliExpress** NPK Official Store +Follow 41306 Followers I'm shopping for... On AliExpress In

Store Home Products Sale Items Top Selling ship from Russia ship from Spain DIY blank reborn doll kit Feedback



NPK Original 45CM Reborn Baby Orangutans Cute Doll Handmade Detailed Painting Premie Size Monkey Collectible Art Doll

**US \$49.04** US-\$106.64 -54%

US \$3.00 off on US-\$300.00 [Get coupons](#)

Size: 45cm 45cm

Quantity:  1  + 500 Pieces available

Delivery [United States](#)

**Free Shipping**  
From China to United States via AliExpress Standard Shipping  
Estimated delivery on Feb 12 [More options](#)

[Buy Now](#) [Add to Cart](#) 10

(Exhibit Y)

52. The domain name registration information for the Defendants' websites reveal anonymous registrants. (Exhibit Z).

53. Defendants advertise shipping times or rates for customers in the United States. (E.g., Exhibits AA, BB, CC, DD, EE, FF.)

54. The Defendants offer to sell and ship their counterfeit products to Utah. The checkout page on Defendants' websites includes a dropdown menu listing Utah as a state to which shipment can be made. (Exhibits AA, BB, CC, DD, EE, FF.)

55. The Defendants accept payments in the United States through Amazon and or PayPal, U.S.-based payment processors subject to orders of this Court. (See Exhibits AA, BB, CC, EE.)

56. The use and sale of Bountiful Baby's copyrighted works by the Defendants causes substantial confusion in the marketplace and causes Bountiful Baby to lose customers, market share, and reputation. In addition, it devalues Bountiful Baby's exclusive rights in its copyrighted sculptures, which form the heart of its Bountiful Baby business.

57. When Bountiful Baby's dolls are copied and sold online, customers are deceived because of the identical products offered by the Defendants, and they are disappointed with the poor-quality counterfeit goods they receive from Defendants.

58. Bountiful Baby has invested substantial time and money to create its sculptures. What is unique and special about Bountiful Baby's reborn dolls is misappropriated by the Defendants. It causes issues with customers who buy counterfeits from the Defendants, and with customers that do not realize the difference (when making the purchase) between an authentic Bountiful Baby product and the counterfeit sold by the Defendants. Unauthorized copying of

Bountiful Baby's copyrighted sculptures is catastrophic and extremely harmful to Bountiful Baby's business.

**FIRST CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002269514  
17 U.S.C. § 106 *et seq***

59. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

60. On September 1, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002269514 (the "'514 Copyright") to protect the "3 Month Joseph Sleeping Head" sculpture, which is attached as Exhibit GG.

61. Bountiful Baby is the owner of the '514 Copyright.

62. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "3 Month Joseph Sleeping Head" sculpture, which are the subject of the '514 Copyright.

63. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

64. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

65. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual

and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

66. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

67. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**SECOND CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002269515  
17 U.S.C. § 106 et seq**

68. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

69. On September 1, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002269515 (the "'515 Copyright") to protect the "3 Month Joseph Arms" sculpture, which is attached as Exhibit HH.

70. Bountiful Baby is the owner of the '515 Copyright.

71. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "3 Month Joseph Arms" sculpture, which are the subject of the '515 Copyright.

72. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to

publicly display its work.

73. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

74. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

75. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

76. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**THIRD CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002268599**

**17 U.S.C. § 106 *et seq***

77. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

78. On September 1, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002268599 (the "'599 Copyright") to protect the "3 Month Joseph Legs" sculpture, which is attached as Exhibit II.

79. Bountiful Baby is the owner of the '599 Copyright.

80. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "3 Month Joseph Legs" sculpture, which are the subject of the '599 Copyright.

81. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

82. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

83. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

84. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

85. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**FOURTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002269513  
17 U.S.C. § 106 *et seq***

86. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

87. On September 1, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002269513 (the “’513 Copyright”) to protect the “3 Month Joseph Awake Head” sculpture, which is attached as Exhibit JJ.

88. Bountiful Baby is the owner of the ’513 Copyright.

89. Defendants have made and used unauthorized reproductions of Bountiful Baby’s original “3 Month Joseph Awake Head” sculpture, which are the subject of the ’513 Copyright.

90. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby’s protected works without Bountiful Baby’s consent. Defendants’ acts violate Bountiful Baby’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

91. Defendants’ infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby’s copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby’s copyrighted works.

92. Because of Defendants’ infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants’ profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

93. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

94. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**FIFTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002268423  
17 U.S.C. § 106 et seq**

95. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

96. On August 30, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002268423 (the "'423 Copyright") to protect the "Nod Head" sculpture, which is attached as Exhibit KK.

97. Bountiful Baby is the owner of the '423 Copyright.

98. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Nod Head" sculpture, which are the subject of the '423 Copyright.

99. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

100. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

101. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

102. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

103. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**SIXTH CLAIM FOR RELIEF**  
(against all Defendants)  
**Copyright Infringement of U.S. Copyright No. VA0002264578**  
**17 U.S.C. § 106 *et seq***

104. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

105. On August 30, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002265478 (the "'478 Copyright") to protect the "Nod Arms" sculpture, which is attached as Exhibit LL.

106. Bountiful Baby is the owner of the '479 Copyright.

107. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Nod Arms" sculpture, which are the subject of the '479 Copyright.

108. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

109. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

110. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

111. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

112. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**SEVENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002265489  
17 U.S.C. § 106 *et seq***

113. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

114. On August 30, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002265489 (the “’489 Copyright”) to protect the “Nod Legs” sculpture, which is attached as Exhibit MM.

115. Bountiful Baby is the owner of the ’489 Copyright.

116. Defendants have made and used unauthorized reproductions of Bountiful Baby’s original “Nod Legs” sculpture, which are the subject of the ’489 Copyright.

117. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby’s protected works without Bountiful Baby’s consent. Defendants’ acts violate Bountiful Baby’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

118. Defendants’ infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby’s copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby’s copyrighted works.

119. Because of Defendants’ infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants’ profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

120. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

121. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**EIGHTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002255282  
17 U.S.C. § 106 et seq**

122. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

123. On June 11, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002255282 (the "'282 Copyright") to protect the "Darren Sleeping Head" sculpture, which is attached as Exhibit NN.

124. Bountiful Baby is the owner of the '282 Copyright.

125. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Darren Sleeping Head" sculpture, which are the subject of the '282 Copyright.

126. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

127. Defendants' infringement has been undertaken willfully with the intent to

financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

128. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

129. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

130. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**NINTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002281257**  
**17 U.S.C. § 106 et seq**

131. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

132. On September 22, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002281257 (the "257 Copyright") to protect the "Darren Awake Asleep Arms" sculpture, which is attached as Exhibit OO.

133. Bountiful Baby is the owner of the '257 Copyright.

134. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Darren Awake Asleep Arms" sculpture, which are the subject of the '257 Copyright.

135. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

136. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

137. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

138. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

139. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**TENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002281255**  
**17 U.S.C. § 106 *et seq***

140. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

141. On September 22, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002281255 (the “’255 Copyright”) to protect the “Darren Awake Asleep Legs” sculpture, which is attached as Exhibit PP.

142. Bountiful Baby is the owner of the ’255 Copyright.

143. Defendants have made and used unauthorized reproductions of Bountiful Baby’s original “Darren Awake Asleep Legs” sculpture, which are the subject of the ’255 Copyright.

144. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby’s protected works without Bountiful Baby’s consent. Defendants’ acts violate Bountiful Baby’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

145. Defendants’ infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby’s copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby’s copyrighted works.

146. Because of Defendants’ infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants’ profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

147. Because of Defendants’ willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

148. Defendants’ infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains

Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**ELEVENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002271682  
17 U.S.C. § 106 *et seq***

149. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

150. On September 21, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002271682 (the "'682 Copyright") to protect the "Easton Head" sculpture, which is attached as Exhibit QQ.

151. Bountiful Baby is the owner of the '682 Copyright.

152. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Easton Head" sculpture, which are the subject of the '682 Copyright.

153. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

154. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

155. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual

and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

156. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

157. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**TWELFTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002272482  
17 U.S.C. § 106 et seq**

158. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

159. On September 21, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002272482 (the "'482 Copyright") to protect the "Easton Arms" sculpture, which is attached as Exhibit RR.

160. Bountiful Baby is the owner of the '482 Copyright.

161. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Easton Arms" sculpture, which are the subject of the '482 Copyright.

162. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to

publicly display its work.

163. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

164. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

165. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

166. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**THIRTEENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002272481**

**17 U.S.C. § 106 *et seq***

167. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

168. On September 21, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002272481 (the “481 Copyright”) to protect the “Easton Legs” sculpture, which is attached as Exhibit SS.

169. Bountiful Baby is the owner of the '481 Copyright.

170. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Easton Legs" sculpture, which are the subject of the '481 Copyright.

171. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

172. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

173. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

174. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

175. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**FOURTEENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002284512  
17 U.S.C. § 106 *et seq***

176. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

177. On December 16, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002284512 (the “’512 Copyright”) to protect the “Elliot Head” sculpture, which is attached as Exhibit TT.

178. Bountiful Baby is the owner of the ’512 Copyright.

179. Defendants have made and used unauthorized reproductions of Bountiful Baby’s original “Elliot Head” sculpture, which are the subject of the ’512 Copyright.

180. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby’s protected works without Bountiful Baby’s consent. Defendants’ acts violate Bountiful Baby’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

181. Defendants’ infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby’s copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby’s copyrighted works.

182. Because of Defendants’ infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants’ profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

183. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

184. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**FIFTEENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002284359  
17 U.S.C. § 106 et seq**

185. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

186. On December 15, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002284359 (the "'359 Copyright") to protect the "Easton/Elliott/Grant/Michelle Arms" sculpture, which is attached as Exhibit UU.

187. Bountiful Baby is the owner of the '359 Copyright.

188. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Easton/Elliott/Grant/Michelle Arms" sculpture, which are the subject of the '359 Copyright.

189. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

190. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

191. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

192. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

193. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**SIXTEENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002272484**  
**17 U.S.C. § 106 *et seq***

194. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

195. On September 15, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002272484 (the "'484 Copyright") to protect the "Blinkin Head" sculpture, which is attached as Exhibit VV.

196. Bountiful Baby is the owner of the '484 Copyright.

197. Defendants have made and used unauthorized reproductions of Bountiful Baby's

original “Blinkin Head” sculpture, which are the subject of the ’484 Copyright.

198. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby’s protected works without Bountiful Baby’s consent. Defendants’ acts violate Bountiful Baby’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

199. Defendants’ infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby’s copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby’s copyrighted works.

200. Because of Defendants’ infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants’ profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

201. Because of Defendants’ willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

202. Defendants’ infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby’s protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**SEVENTEENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002268524**  
**17 U.S.C. § 106 *et seq***

203. Bountiful Baby incorporates and realleges each and every allegation in the

preceding paragraphs, as if fully set forth herein.

204. August 30, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002268524 (the “‘524 Copyright”) to protect the “Blinkin Arms” sculpture, which is attached as Exhibit WW.

205. Bountiful Baby is the owner of the ‘524 Copyright.

206. Defendants have made and used unauthorized reproductions of Bountiful Baby’s original “Blinkin Arms” sculpture, which are the subject of the ‘524 Copyright.

207. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby’s protected works without Bountiful Baby’s consent. Defendants’ acts violate Bountiful Baby’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

208. Defendants’ infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby’s copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby’s copyrighted works.

209. Because of Defendants’ infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants’ profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

210. Because of Defendants’ willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

211. Defendants’ infringement has caused and continues to cause irreparable harm to

Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**EIGHTEENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002268519  
17 U.S.C. § 106 et seq**

212. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

213. August 30, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002268519 (the "'519 Copyright") to protect the "Blinkin Legs" sculpture, which is attached as Exhibit XX.

214. Bountiful Baby is the owner of the '519 Copyright.

215. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Blinkin Legs" sculpture, which are the subject of the '519 Copyright.

216. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

217. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

218. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

219. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

220. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**NINETEENTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002255449**  
**17 U.S.C. § 106 *et seq***

221. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

222. June 11, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002255449 (the "'449 Copyright") to protect the "Skya Head Sleeping" sculpture, which is attached as Exhibit YY.

223. Bountiful Baby is the owner of the '449 Copyright.

224. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Skya Head Sleeping" sculpture, which are the subject of the '449 Copyright.

225. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive

rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

226. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

227. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

228. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

229. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**TWENTIETH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002271944**

**17 U.S.C. § 106 *et seq***

230. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

231. September 20, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002271944 (the "944 Copyright") to protect the "Skya Awake/Asleep Arms" sculpture, which is attached as Exhibit ZZ.

232. Bountiful Baby is the owner of the '944 Copyright.

233. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Skya Awake/Asleep Arms" sculpture, which are the subject of the '944 Copyright.

234. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

235. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

236. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

237. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

238. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**TWENTY-FIRST CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002271942  
17 U.S.C. § 106 *et seq***

239. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

240. September 20, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002271942 (the “’942 Copyright”) to protect the “Skya Awake/Asleep Legs” sculpture, which is attached as Exhibit AAA.

241. Bountiful Baby is the owner of the ’942 Copyright.

242. Defendants have made and used unauthorized reproductions of Bountiful Baby’s original “Skya Awake/Asleep Legs” sculpture, which are the subject of the ’942 Copyright.

243. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby’s protected works without Bountiful Baby’s consent. Defendants’ acts violate Bountiful Baby’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

244. Defendants’ infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby’s copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby’s copyrighted works.

245. Because of Defendants’ infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants’ profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

246. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

247. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**TWENTY-SECOND CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002273961  
17 U.S.C. § 106 et seq**

248. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

249. September 30, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002273961 (the "'961 Copyright") to protect the "Bindi Head" sculpture, which is attached as Exhibit BBB.

250. Bountiful Baby is the owner of the '961 Copyright.

251. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Bindi Head" sculpture, which are the subject of the '961 Copyright.

252. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

253. Defendants' infringement has been undertaken willfully with the intent to

financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

254. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

255. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

256. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**TWENTY-THIRD CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002277644**  
**17 U.S.C. § 106 et seq**

257. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

258. September 22, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002277644 (the "'644 Copyright") to protect the "Bindi/Binki Legs" sculpture, which is attached as Exhibit CCC.

259. Bountiful Baby is the owner of the '644 Copyright.

260. Defendants have made and used unauthorized reproductions of Bountiful Baby's original "Bindi/Binki Legs" sculpture, which are the subject of the '644 Copyright.

261. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby's protected works without Bountiful Baby's consent. Defendants' acts violate Bountiful Baby's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

262. Defendants' infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby's copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby's copyrighted works.

263. Because of Defendants' infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

264. Because of Defendants' willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

265. Defendants' infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**TWENTY-FOURTH CLAIM FOR RELIEF**

(against all Defendants)

**Copyright Infringement of U.S. Copyright No. VA0002271799**  
**17 U.S.C. § 106 *et seq***

266. Bountiful Baby incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

267. September 17, 2021, Bountiful Baby obtained U.S. Copyright Registration No. VA0002271799 (the “’799 Copyright”) to protect the “Binki Head” sculpture, which is attached as Exhibit DDD.

268. Bountiful Baby is the owner of the ’799 Copyright.

269. Defendants have made and used unauthorized reproductions of Bountiful Baby’s original “Binki Head” sculpture, which are the subject of the ’799 Copyright.

270. Defendants have produced, reproduced, and/or prepared reproductions of Bountiful Baby’s protected works without Bountiful Baby’s consent. Defendants’ acts violate Bountiful Baby’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

271. Defendants’ infringement has been undertaken willfully with the intent to financially gain from Bountiful Baby’s copyrighted work, and with the intent to violate the permanent injunction entered by this Court. Defendants have willfully infringed Bountiful Baby’s copyrighted works.

272. Because of Defendants’ infringing acts, Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants’ profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

273. Because of Defendants’ willful infringement, Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

274. Defendants’ infringement has caused and continues to cause irreparable harm to Bountiful Baby, for which it has no adequate remedy at law. Unless this Court restrains

Defendants from infringing Bountiful Baby's protected work, the harm will continue to occur in the future. Accordingly, Bountiful Baby is entitled to a preliminary and permanent injunction.

**PRAYER FOR RELIEF**

Wherefore, Bountiful Baby respectfully prays that the Court enter judgment in its favor and award the following relief against Defendants:

- A. A judgment in favor of Bountiful Baby that Defendants have infringed the registered Bountiful Baby Copyrights;
- B. A judgment in favor of Bountiful Baby that Defendants' infringement of the registered Bountiful Baby Copyrights has been willful;
- C. A judgment in favor of Bountiful Baby that Bountiful Baby is entitled to its actual and/or statutory damages and disgorgement of Defendants' profits attributable to the infringement of the Bountiful Baby Copyrights, in an amount to be proved at trial;
- D. A judgment in favor of Bountiful Baby that Bountiful Baby is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2) due to Defendants' willful infringement;
- E. An order and judgment enjoining Defendants and their officers, directors, employees, agents, licensees, representatives, affiliates, related companies, servants, successors and assigns, and any and all persons acting in privity or in concert with any of them, from infringing the registered Bountiful Baby Copyrights;
- F. Any other relief the Court deems just and proper under all the circumstances.

**Demand for Trial by Jury**

Bountiful Baby demands a jury trial on all matters triable to a jury.

DATED this 30th day of March 2022.

Respectfully submitted,

By: /s/ Brian N. Platt

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*Counsel for Plaintiff DP Creations, LLC*

## **VERIFICATION**

I, Nevin Pratt, declare that my wife Denise Pratt and I are the owners of DP Creations, LLC dba Bountiful Baby, Plaintiff in the case captioned *DP Creations LLC v. Adolly.com et al.*, in the United States District Court for the District of Utah. Denise and I authorized the filing of this Complaint. I have reviewed the factual allegations made in this Complaint, and to those allegations of which I have personal knowledge, I know them to be true. For those allegations of which I do not have personal knowledge, I believe them to be true based on the information and documents I have reviewed in connection with the preparation of this Complaint, and which are attached to the Complaint, including the Defendants' websites, product listings, product photos, and the products offered for sale.

Dated: March 18, 2022

Verified by:

A handwritten signature in black ink, appearing to read "N. Pratt".

Nevin Pratt, Owner  
DP Creations, LLC dba Bountiful Baby